THE CLEAN POWER PLAN: CREDIT FOR IOWA'S EARLY ACTION ON RENEWABLES

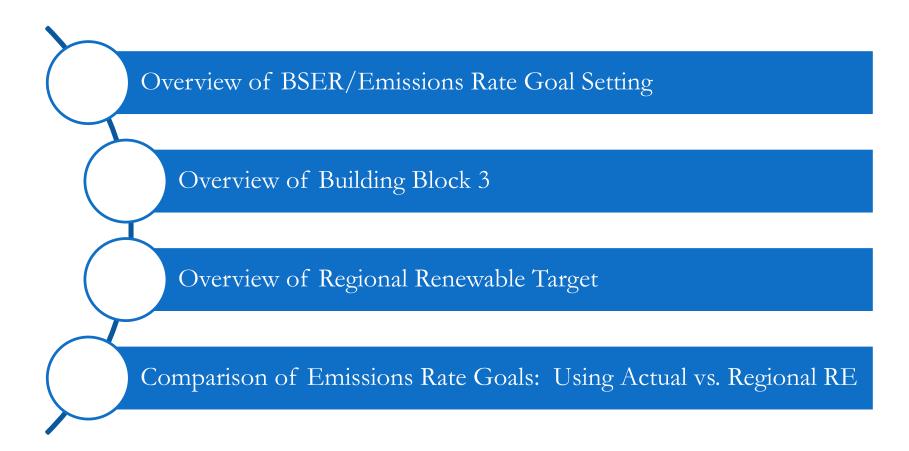
Iowa Environmental Council Environmental Law & Policy Center





September 19, 2014

Presentation Overview



Establishing State Goals: Building Block Method

Building Block 1:

Increase Efficiency of Existing, Fossil – Fuel Fired Power Plants

(6% Heat Rate Improvement)

Building Block 2:

Increase Use of Existing Lower-Emitting Sources

(NGCC - 70% Capacity Factor)

Iowa's 2012 Emissions Rate: 1,552 lbs/MWh

2030 Emissions Rate Goal: 1,301 lbs/MWh

Building Block 3:

Increase Use of Low/Zero Emitting Sources

(Regional RE Target of 15%)

Building Block 4:

Increase Demand-Side Energy Efficiency Programs

(1.5% Annual Incremental Savings)

Building Block 3: Increase Use of Low/Zero Emitting Energy Generation

To establish state-specific carbon emission goals, the EPA set renewable energy generation targets.



Renewable Energy Targets were established based on states' regional performance and growth factors.



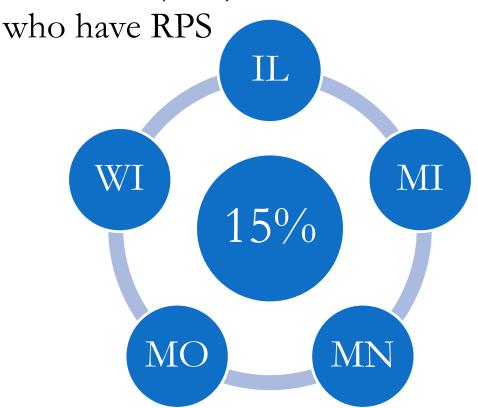
As part of the North-Central Region, Iowa's renewable energy target for 2030 is 15% of total generation

Proposed 111(d) North Central Region:

- Illinois
- Indiana
- Michigan
- Minnesota
- Missouri
- North Dakota
- South Dakota
- Wisconsin
- Iowa

North Central Regional
 Renewable Energy Target =

Average of 2020 Renewable Portfolio Standards (RPS) from states in region



State Renewable Portfolio Standards in NC Region

State	Renewable Portfolio Standard	Percentage (%) in 2020
Illinois	25% by 2025	16
Indiana	none	(17)
lowa	surpassed	747
Michigan	10% by 2015	10
Minnesota	30% by 2020	30
Missouri	15% by 2021	10
North Dakota	none	470
South Dakota	none	100
Wisconsin	10% by 2015	10
	The Charles and Annual Charles and Charles	100 400

Regional Average for Building Block 3:

IOWA'S RENEWABLE TARGET

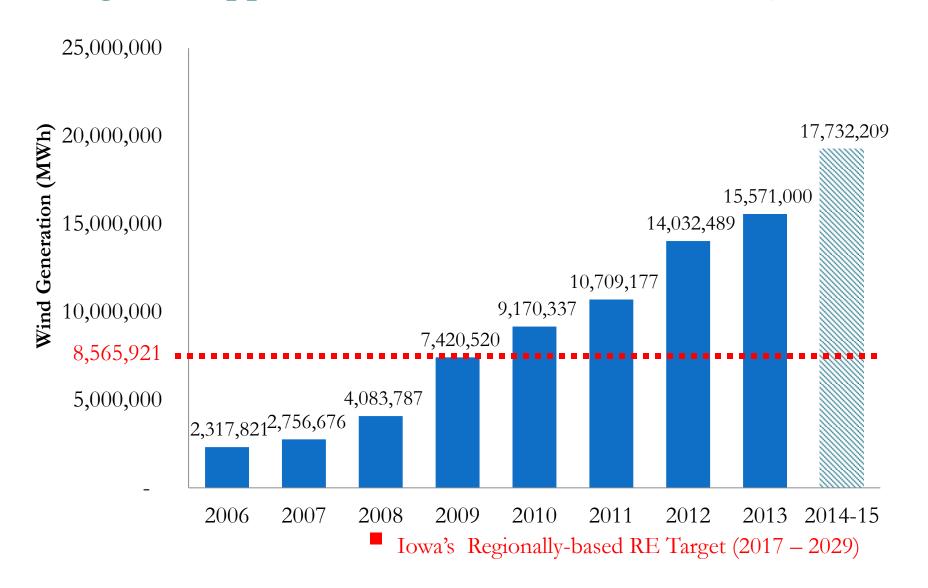
Applying the Regional Renewable Energy Target to Iowa

Calculating Iowa's RE Target for 2030

• To calculate Iowa's renewable generation target for 2030, the EPA multiplied the state's total in-state generation in 2012 by the North Central Region's Renewable Generation Target:

- Total in-state generation in Iowa in 2012 (unadjusted) = 56,675,403.92 MWh
- NC Regional Renewable Generation Target = 15.114%
- Iowa's 2020-2030 Renewable Energy Generation Goal $(56,675,403.92 \times 15.114\%) = 8,565,921$ MWh

Regional Approach Gives Iowa Credit for Early Action



COMPARING EMISSIONS GOALS

Calculating Iowa's Emission's Rate Goal Using Regional Renewable Energy Targets

EPA's Emissions Rate Goal Formula

• EPA's Emissions Rate Goal Formula: =

```
[(Hist. Coal Gen. x Coal Emission Rate) + (Hist. NGCC Gen. x NGCC Emission Rate) + (Hist. O/G Gen. x O/G Emission Rate) + ("Other" Gen. x Other Emission Rate)]
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```
Coal gen. + NGCC Gen. + O/G Gen. + "Other" Gen. + Nuclear Gen. + Renewable Gen. (2012 Actual Gen. x 15%) + Energy Eff. Gen.
```

Iowa's 2030 Emissions Rate Goal

$$[(26,779,114 \times 2116) + (7,771,468 \times 894) + (247,181 \times 2,422) + (0 \times 0)]$$

Iowa's Emissions Rate Goal for 2030 = 1,301 lbs/MWh

COMPARING EMISSIONS GOALS

Calculating Iowa's Emissions Rate Goal using actual, 2012 renewable energy generation

Emissions Rate Goal Formula - Actual RE

• EPA's Emissions Rate Goal Formula: =

```
[(Hist. Coal Gen. x Coal Emission Rate) + (Hist. NGCC Gen. x NGCC Emission Rate) + (Hist. O/G Gen. x O/G Emission Rate) + ("Other" Gen. x Other Emission Rate)]
```

```
Coal gen. + NGCC Gen. + O/G Gen. + "Other" Gen. + Nuclear Gen. + 2012 Actual Renewable Generation + Energy Eff. Gen.
```

Iowa's Emissions Rate Goal – Actual RE

$$[(26,779,114 \times 2116) + (7,771,468 \times 894) + (247,181 \times 2,422) + (0 \times 0)]$$

Iowa's Emissions Rate Goal for 2030 = 1,168 lbs/MWh

Comparing Iowa's Emission Rate Goal

Using Average, 2020 Renewable Portfolio Standards (RPS) from 5 North Central States

1,301 lbs/MWh

16% reduction from Baseline 1,552 lbs/MWh

Using Actual, 2012 Renewable Generation in Iowa

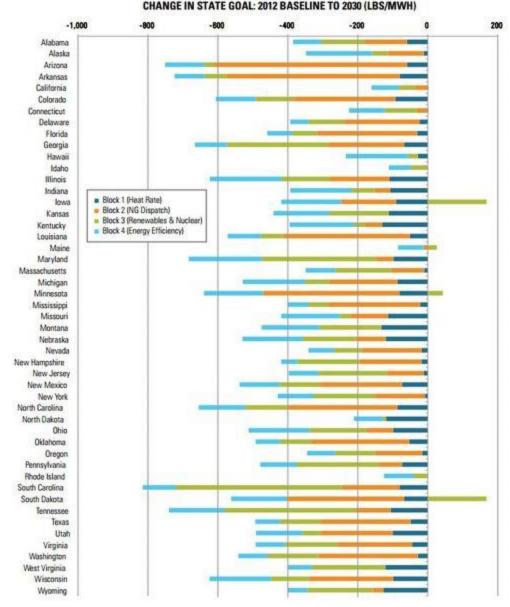
1,168 lbs/MWh

25% reduction from Baseline 1,552 lbs/MWh

Iowa's early action on renewables gives Iowa credit:

Iowa is 1 of 4 states where Building Block 3 calls for less renewable generation than what is actually installed.

Iowa's emissions rate goal is the 5th lowest percent change in the U.S.



Source for Table: Natural Resources Defense Council

Regional Approach Gives Iowa Credit for Early Action

